

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

**VON KING, DANIELLE JOHNSON,  
CHELSEA SHAW, JOY FLOWERS,  
SUSAN KOLYNO, JACQUELINE  
PERKINS, ARTHUR WILLIAMS,  
and JANE/JOHN DOE 1-9,**

**Plaintiffs, on behalf  
of themselves and all others  
similarly situated,**

**v.**

**STATE OF GEORGIA,  
GEORGIA DEPARTMENT OF  
LABOR, and  
COMMISSIONER MARK BUTLER,  
in his official capacity,**

**Defendants.**

**CIVIL ACTION FILE NO.  
1:21-CV-03082-JPB**

**(CLASS ACTION)**

**PLAINTIFFS' UNOPPOSED MOTION TO GRANT  
PRELIMINARY APPROVAL OF CLASS SETTLEMENT**

Plaintiffs, Von King, Danielle Johnson, Chelsea Shaw, Joy Flowers, Susan Kolyno, Jacqueline Perkins, and Arthur Williams, through counsel, hereby move that the Court: (1) grant preliminary approval of the proposed Settlement Agreement attached hereto as Exhibit 1, subject to further hearing and determination under Fed.R.Civ.P. 23(e); (2) schedule a final approval hearing which may be continued

from time to time by Order of the Court, and without further notice to the Class; (3) approve the proposed Notice Plan contained in that agreement; (4) find that the Notice Plan is appropriate under the circumstances, and that the Notice Plan fully satisfies the requirements of due process and the Federal Rules of Civil Procedure; (5) set a date Class Members to object to the proposed settlement; (6) provide that any objection to the proposed Settlement and any papers submitted in support of said objection shall be received and considered by the Court at the Final Approval Hearing only if the objection, along with copies of any supporting papers, is filed with the Clerk of the Court within thirty (30) calendar days following the date of the Order; (7) provide that the Released Claims of all Settling Plaintiffs shall be barred as of the entry of judgment.

Respectfully submitted on June 14<sup>th</sup>, 2022.

/s/ Jason J. Carter

Jason J. Carter

Ga. Bar No. 141669

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**CERTIFICATE OF SERVICE**

I certify that on June 14, 2022 I filed this **PLAINTIFFS' UNOPPOSED  
MOTION TO GRANT PRELIMINARY APPROVAL OF CLASS  
SETTLEMENT** using the Court's CM/ECF system which will automatically  
email a copy of the document to all counsel of record.

/s/ Jason J. Carter

Jason J. Carter  
Ga. Bar No. 141669